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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001 : 03 MD 1570 (RCC)
: ECF Case
:
:

This document relates to:
New York Marine and General Ins. Co. v. Al Qaida,
04-cv-6105 (RCC)

**STIPULATION WITH REGARD TO RULING ON
MOTION TO DISMISS OF
DEFENDANT PRINCE NAIF BIN ABDULAZIZ AL SAUD
IN RELATED CASES**

WHEREAS the plaintiffs in the action entitled *New York Marine and General Ins. Co. v. Al Qaida* (the "Action") filed their complaint on August 6, 2004;

WHEREAS Prince Naif bin Abdulaziz Al Saud ("Prince Naif" or "His Highness") is named as a defendant in the complaint in the Action;

WHEREAS Prince Naif has filed a consolidated motion to dismiss the complaints naming him as a defendant in the following related cases (the "Related Cases"): *Ashton v. Al Qaeda Islamic Army*, 02-CV-6977 (RCC); *Burnett v. Al Baraku Investment & Development Corp.*, 03-CV-9849 (RCC); *Federal Insurance Co. v. Al Qaida*, 03-CV-6978; *Salvo v. Al Qaeda Islamic Army*, 03-CV-5071 (RCC) (the "Consolidated Motion");

WHEREAS Prince Naif's Consolidated Motion has been ruled on by the Court in its Opinion and Order dated September 21, 2005;

WHEREAS the allegations in the complaint in the Action parallel those in the complaints filed in the Related Cases and, in many instances, are identical to them; in particular, the

allegations that make specific reference to Prince Naif in the complaint in the Action are substantially similar to those in the Related Cases;

WHEREAS the parties hereto wish to avoid, if possible, burdening the Court with additional filings or themselves with unnecessary litigation costs;

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that:

1. The parties hereto adopt as a binding order in the Action, with regard to Prince Naif, the Order and Opinion of this Court dated September 21, 2005, deciding the Consolidated Motion (the "Order").

2. In the event the Order is appealed, the parties hereto will adopt as a binding order in the Action, with regard to Prince Naif, any subsequent rulings by any appellate courts with regard to the Order.

3. All further proceedings in the Action with regard to Prince Naif are stayed pending the resolution of the Consolidated Motion. After resolution of the Consolidated Motion, if the Court, with regard to the cases covered by the Consolidated Motion, orders or requires the filing of any answer by Prince Naif and/or orders or permits discovery with regard to Prince Naif, such order, requirement or permission will apply to the Action, as well.

Respectfully Submitted,

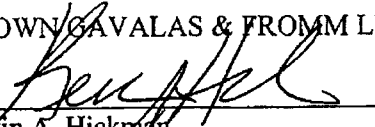
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So Ordered:



RICHARD CONWAY CASEY, USDJ

Dated: November 1, 2005